

REGISTRATION FILE ROOM MONSANTO



MONSANTO COMPANY  
1300 I (EYE) STREET, NW  
SUITE 450 EAST  
WASHINGTON, D.C. 20005  
PHONE (202) 783-2866  
FAX (202) 789-1748  
<http://www.monsanto.com>

March 20, 2006

Document Processing Desk  
Registration Division – H7505C  
U.S. Environmental Protection Agency  
1801 South Bell Street  
Crystal Mall #2, Room 266A  
Arlington, Virginia 22202-4501

Attention: Mr. James A. Tompkins  
Product Manager 25

Subject: **MON 78365 Herbicide**  
**QuikPRO Herbicide**  
**EPA Reg. No. 524-535**  
**Certification of Child Resistant Packaging**

Dear Mr. Tompkins:

Monsanto herein requests the Agency approval of child resistant packaging for the 1.5 oz foil pouch for QuikPRO Herbicide. This label is based on the EPA Stamped label dated May 12, 2003.

After a meeting between Monsanto and the Agency January 13, 2005, in a letter dated February 8, 2005, Monsanto agreed to research child resistant packaging options for package skus of QuikPRO herbicide. Pursuant to requirements in 40 CFR Part 157.22, and 157.34, Monsanto submitted certification to child-resistant packaging for the 6.8 lb package of QuikPRO herbicide, MON 78365 and distributor supplemental product, Lesco Prosecutor Swift Acting, 524-535-10404 in a letter dated January 24, 2006. Monsanto selected a Van Blarcom Closure, Saf Cap III-A, ASTM certified type I closure compliant with CFR Title 16, Part 1700 and on the EPA list of approved CRP vendors.

Monsanto contracted with National Child Resistant Testing Inc (NCRT) to perform a Sequential Child Test and a Senior Adult Use Effectiveness Test on a new pouch and material to determine if the package meets the requirements of 16 CFR 1700. The results of this testing are attached.

Pursuant to the results of this testing, I certify that the packaging used for this product meets the standards of 40 CFR 157.32, including the revised standards in 16 CFR 1700.15(b), when tested by the revised testing procedures in 16 CFR 1700.20, as published in 60 FR 37710 (July 21, 1995). The type of package is a sealed 4 3/16 x 5 3/4 inch foil pouch made of 3 mil valeron/7#LDPE/ 0.00035" foil/7# EMAA/1.25 Mil Surlyn Film manufactured by American Packaging.



ED\_006453A\_00002856-00001

This amendment is classified as part of the Agency's Fast-Track Program and therefore no fee is due. The following documents are included with this notification:

Application for Pesticide (form 8570-1)  
Final Report dated February 23, 2006 from NCRT  
Existing pouch artwork and revised pouch artwork

If you should have any questions regarding this submission, please call Dr. Russell P. Schneider at (202) 383-2866 or call me at (314) 694-6576.

Sincerely,



Dawn Fee-White  
Registration Manager

Cc w/ attachments: Russ Schneider  
Rosalind L. Gross, Technical Review Branch  
J. Winski  
File

Attachment: Final Report by National Child Resistant Testing, Inc.



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

303848

## Application for Pesticide - Section I

|   |  |  |
|---|--|--|
| 1. Company/Product Number<br>Monsanto Company / 524-535   | 2. EPA Product Manager<br>Mr. James Tompkins   | 3. Proposed Classification<br><input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted |
| 4. Company/Product (Name)<br>MON-78365; QuikPro Herbicide   | PM#<br>25  |  |
| 5. Name and Address of Applicant (Include ZIP Code)<br>Monsanto Company<br>1300 I (Eye) Street, N.W., Suite 450 East<br>Washington, DC 20005<br><input type="checkbox"/> Check if this is a new address | 6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to:<br>EPA Reg. No. _____<br>Product Name _____ |  |

## Section - II

|  |  |
|--|--|
| <input type="checkbox"/> Amendment - Explain below.                            | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> "Me Too" Application.   |
| <input type="checkbox"/> Notification - Explain below.                         | <input checked="" type="checkbox"/> Other - Explain below.                             |

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Certification of CRP.

Monsanto believes this is a fast-track notification with no associated PRIA fee. Please email any fee requirement response to Regulatory.Affairs@Monsanto.com.

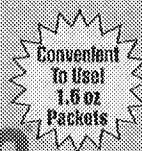
I certify that the packaging that will be used for this product meets the standard 40 CFR 157.32

## Section - III

|   |  |   |                        |   |                                  |
|---|--|---|------------------------|---|----------------------------------|
| 1. Material This Product Will Be Packaged In:   |  |   |                        | 2. Type of Container  |                                  |
| Child-Resistant Packaging<br><input checked="" type="checkbox"/> Yes*<br><input type="checkbox"/> No  | Unit Packaging<br><input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> No | Water Soluble Packaging<br><input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No |                        | <input type="checkbox"/> Metal  | <input type="checkbox"/> Plastic |
| * Certification must be submitted   |  |   |                        | <input type="checkbox"/> Glass  | <input type="checkbox"/> Paper   |
| If "Yes" Unit Packaging wgt.<br>1.5 oz.   | No. per container<br>5   | If "Yes" Package wgt.   | No. per container<br>1 | <input checked="" type="checkbox"/> Other (Specify) <u>foil pouch</u>   |                                  |
| 3. Location of Net Contents Information<br><input type="checkbox"/> Label <input checked="" type="checkbox"/> Container   |  | 4. Size(s) Retail Container<br>1.5 oz.  |                        | 5. Location of Label Directions<br><input type="checkbox"/> On Label<br><input type="checkbox"/> On Labeling accompanying product |                                  |
| 6. Manner in Which Label is Affixed to Product<br><input type="checkbox"/> Lithograph<br><input type="checkbox"/> Paper glued<br><input type="checkbox"/> Stenciled |  | <input checked="" type="checkbox"/> Other <u>printed on foil</u>                                  |                        |   |                                  |

## Section - IV

|   |                                       |   |
|---|---------------------------------------|---|
| 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)   |                                       |   |
| Name<br>Dr. Russell P. Schneider  | Title<br>Director, Regulatory Affairs | Telephone No. (Include Area Code)<br>(202) 383-2866 |
| Certification<br>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. |                                       | 6. Date Application Received<br>(Stamped)           |
| 2. Signature<br><i>Dawn Fee-White</i>   | 3. Title<br>Registration Manager      |   |
| 4. Typed Name<br>Dawn Fee-White   | 5. Date<br>March 20, 2006             |   |



**QuikPRO**

Powered by **Roundup**

Read the enclosed label booklet before using this product. Lea todo el folleto adjunto antes de usar este producto. Use only according to label instructions. Read the "LIMIT OF WARRANTY AND LIABILITY", which appears in the label booklet, before buying or using. If terms are not acceptable, return at once unopened. THIS IS AN END-USE PRODUCT. MONSANTO DOES NOT INTEND AND HAS NOT REGISTERED IT FOR REFORMULATION OR REPACKAGING.

Keep out of reach of children.

**CAUTION!** Read precautions in enclosed booklet.

**ACTIVE INGREDIENTS:**

|   |        |
|---|--------|
| *Glyphosate, N-(phosphonomethyl) glycine, in the form of its ammonium salt .....      | 73.3%  |
| Diquat dibromide (6,7-dihydrodipyrido (1,2-a:2',1'-b) pyrazinedilium dibromide) ..... | 2.9%   |
| OTHER INGREDIENTS: .....  | 23.8%  |
|   | 100.0% |

\*Equivalent to 86.6% of the acid, glyphosate  
1.0 pound of QuikPRO® herbicide contains 0.73 pound of the ammonium salt of glyphosate and 0.03 pound of the dibromide salt of diquat.

**NET 1.5 OZ**

THIS PRODUCT CANNOT BE REPACKAGED FOR REFORMULATION SALE

See label booklet for Complete Directions for Use

In case of an emergency involving this product, Call Collect, day or night, (314) 694-4000.

QuikPRO and Powered by Roundup Technology are trademarks of Monsanto Technology LLC.

Product of Brazil; Formulated in the U.S. with U.S. Ingredients

©2004 MONSANTO COMPANY, ST. LOUIS, MISSOURI 63167

EPA Est. 066387-AR-001

EPA Reg. No. 524-535

98005B1-158PW

EPO

TO OPEN  
CUT HERE

**QuikPRO**  
herbicide

Powered by **Roundup**  
TECHNOLOGY

Add one  
1.5 oz packet  
per one gallon  
of water

Read the enclosed label booklet before using this product. Lea todo el folleto adjunto antes de usar este producto. Use only according to label instructions. Read the "LIMIT OF WARRANTY AND LIABILITY" statement, which appears in the label booklet, before buying or using. If terms are not acceptable, return at once unopened. THIS IS AN END-USE PRODUCT. MONSANTO DOES NOT INTEND AND HAS NOT REGISTERED IT FOR REFORMULATION OR REPACKAGING.

Keep out of reach of children.

**CAUTION!** Read precautions in enclosed booklet.

ACTIVE INGREDIENTS:

|   |        |
|---|--------|
| *Glyphosate, N-(phosphonomethyl) glycine, in the form of its ammonium salt    | 73.3%  |
| Diquat dibromide [6,7-dihydrodipyrido (1,2-a:2',1'-c) pyrazinedium dibromide] | 2.9%   |
| OTHER INGREDIENTS:  | 23.8%  |
|   | 100.0% |

\*Equivalent to 66.6% of the acid, glyphosate.

1.0 pound of QuikPRO® herbicide contains 0.73 pound of the ammonium salt of glyphosate and 0.03 pound of the dibromide salt of diquat.

**NET 1.5 OZ**

THIS MULTIPACK UNIT NOT LABELED FOR INDIVIDUAL SALE

See label booklet for Complete Directions for Use.

In case of an emergency involving this product, Call Collect, day or night, (314) 694-4000.

QuikPRO and Powered by Roundup Technology are trademarks of Monsanto Technology LLC.

Product of Brazil; Formulated in the U.S. with U.S. ingredients.

©2005 MONSANTO COMPANY • ST. LOUIS, MISSOURI, 63167 U.S.A.

EPA Est. 065387-AR-001

EPA Reg. No. 524-535

98005D2-15BPW

# National Child Resistant Testing, Inc.



QuickPRO 1.5oz. Pouch

Final Report

Prepared For Monsanto Company

February 23, 2006

*National Child Resistant Testing, Inc.  
610 West Cuming Street, Lincoln, Nebraska 68521  
(402)438-0216*

QuickPRO 1.5oz. Pouch  
Final Report for Monsanto Company

## 1 GENERAL INFORMATION

Client: Monsanto Company  
800 North Lindbergh Blvd.  
St. Louis, MO 63167

Purchase Order: 4508903354

Service Requested: The client has requested a Sequential Child Test and a Senior Adult Use Effectiveness Test be conducted on a pouch to determine if the package meets the requirements of 16 CFR 1700 (Revised July 21, 1995).

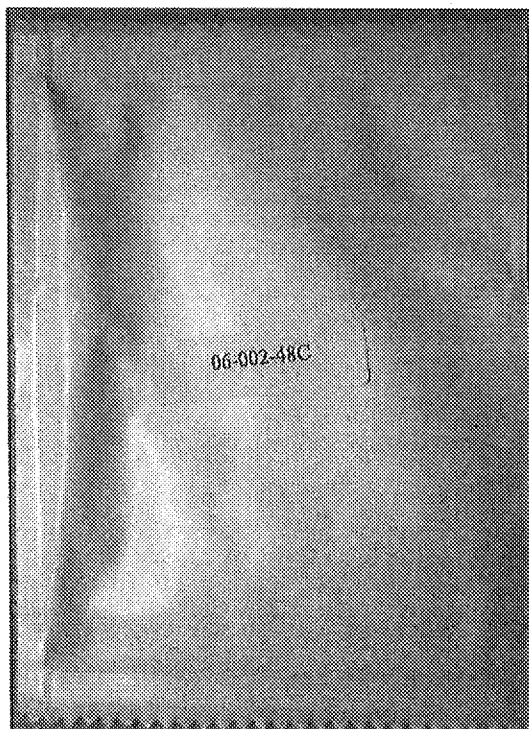
Test Performed: Senior Adult Use Effectiveness Test and Sequential Child Test per 16 CFR 1700

Test Start Date: 2/07/2006

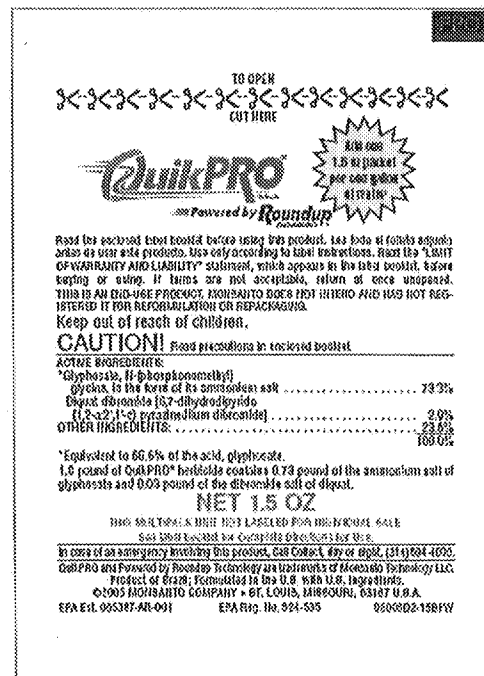
Test End Date: 2/22/2006

NCRT Job #: 06-002

Summary of Results: The testing data indicate the package meets the standard for child-resistant packaging as it is defined in the Code of Federal Regulations 16 CFR 1700.



Package with job number



Print with opening instructions

National Child Resistant Testing, Inc.

## **2 TEST PROTOCOL**

### **2.1 PACKAGE DESCRIPTION**

- 2.1.1 Pouch:
- Material: 3 Mil Valeron/7# LDPE/ 0.00035" Foil/7# EMLA/1.25 Mil Surlyn Film
  - Manufacturer: American Packaging
  - Spec #: AP1088
  - Finished Pouch Dimensions (approximate):  $4 \frac{3}{16} \times 5 \frac{3}{4}$  inches
- 2.1.2 Opening Instructions: Scissors symbol at top of pouch with the following text. "TO OPEN, CUT HERE"

### **2.2 SAMPLE PREPARATION**

- 2.2.1 The adult test samples were prepared in pairs and labeled with an identification number consisting of the NCRT job number (06-002) and a sequential sample number from 1 to 100. The pairs were differentiated with an "A" and "B" designation (e.g. 06-002-10A & 06-002-10B).
- 2.2.2 The child test samples were labeled with an identification number consisting of the NCRT job number (06-002), a sequential sample number from 1 to 50 and a "C" designation (e.g. 06-002-10C).
- 2.2.3 Twenty-five pouches were labeled with "Demo" to be used for demonstration during the child test.

### **2.3 PROCEDURES**

- 2.3.1 The following procedures from the Code of Federal Regulations were used to conduct the test.
- Senior Adult Test - 16 CFR 1700.20 (a)(3)
  - Sequential Child Test- 16 CFR 1700.20 (a)(2)
- 2.3.2 All instructions given to the children and adult participants are detailed in the above regulatory citations.
- 2.3.3 At the beginning of the test, the adult participants were given a paper copy of the package artwork which included the opening instructions. The artwork was provided by Monsanto.
- 2.3.4 The children were given one pouch at the beginning of the test.

### **2.4 TEST PARTICIPANTS**

- 2.4.1 100 adults (50-70 years), broken into three age groups (25%, 50-54 years; 25%, 55-59 years; 50%, 60-70 years). Gender breakdown of 70% female and 30% male in each age group.
- 2.4.2 50 children (42-51 months), broken into three age groups (30%, 42-44 months, 40%, 45-48 months; 30%, 49-51 months). Gender breakdown of 50% female and 50% male with a 10% difference allowed in each age category.



## 2.5 FAILURE DEFINITIONS

- 2.5.1 Senior Adults. Any adult who was unable to open the package during the first five-minute test period, but was able to pass the screening test was counted as a failure. Or, any adult who was unable to open the package during the second one-minute test period was counted as a failure.
- 2.5.2 Children. Any child who was able to gain partial access to the inside of the pouch

## 3 RESULTS

### 3.1 SENIOR ADULT TEST RESULTS

- 3.1.1 One hundred adults (100%) successfully opened the packages in both the 5-minute and the 1-minute test periods. The results are summarized in Table 1. The adult test sites are summarized in Table 2. The adult testers are summarized in Table 3
- 3.1.2 Statistics
- Mean opening time of the 5-minute period was 15 seconds, Std. Dev. of 17
  - Mean opening time of the 1-minute period was 6 seconds, Std. Dev. of 7

Table 1  
Adult panel, Total Packages Opened

| Panelists      |            |           |           | Successful Openings               |           |                                   |           |
|----------------|------------|-----------|-----------|-----------------------------------|-----------|-----------------------------------|-----------|
| Age<br>(Years) | Total      | Males     | Females   | Opened in 5-minute<br>Test Period |           | Opened in 1-minute<br>Test Period |           |
|                |            |           |           | Male                              | Female    | Male                              | Female    |
| 50-54          | 25         | 8         | 17        | 8                                 | 17        | 8                                 | 17        |
| 55-59          | 25         | 7         | 18        | 7                                 | 18        | 7                                 | 18        |
| 60-70          | 50         | 15        | 35        | 15                                | 35        | 15                                | 35        |
| <b>Totals</b>  | <b>100</b> | <b>30</b> | <b>70</b> | <b>30</b>                         | <b>70</b> | <b>30</b>                         | <b>70</b> |

Table 2  
Summary of Adult Test Sites

| Test Site    | Number of Adults Tested | % of Total Panel |
|--------------|-------------------------|------------------|
| 2            | 24                      | 24               |
| 3            | 1                       | 1                |
| 4            | 11                      | 11               |
| 5            | 2                       | 2                |
| 9            | 24                      | 24               |
| 10           | 1                       | 1                |
| 13           | 24                      | 24               |
| 16           | 13                      | 13               |
| <b>Total</b> | <b>100 Adults</b>       | <b>100%</b>      |

QuickPRO 1.5oz. Pouch  
Final Report for Monsanto Company

Table 3  
Summary of Adult Testers

| Tester       | Number of Adults Tested | % of Total Panel |
|--------------|-------------------------|------------------|
| CSN          | 12                      | 12               |
| MN           | 29                      | 29               |
| EE           | 35                      | 35               |
| PB           | 24                      | 24               |
| <b>Total</b> | <b>100 Adults</b>       | <b>100%</b>      |

1

### 3.2 CHILD TEST RESULTS

- 3.2.1 Of the 50 children tested, one child successfully gained access to the inside of the pouch during the 10-minute test. The one opening occurred in the first five-minute period prior to the demonstration.
- 3.2.2 The results are summarized in Table 4. The individual failures are described in Table 5. The child test sites are summarized in Table 6. The child testers are summarized in Table 7.
- 3.2.3 **Statistics** The mean opening time and standard deviation do not apply because only one of the children opened the package (opened in first 5-minute period).

Table 4  
Child Panel, Results

| Panelists       |           |           |           | Successful Entries   |          |                     |          |                  |
|-----------------|-----------|-----------|-----------|----------------------|----------|---------------------|----------|------------------|
| Age<br>(Months) | Total     | Males     | Females   | Before Demonstration |          | After Demonstration |          | Total<br>Entries |
|                 |           |           |           | Males                | Female   | Males               | Female   |                  |
| 42 - 44         | 15        | 8         | 7         | 0                    | 0        | 0                   | 0        | 0                |
| 45 - 48         | 20        | 10        | 10        | 0                    | 0        | 0                   | 0        | 0                |
| 49 - 51         | 15        | 8         | 7         | 1                    | 0        | 0                   | 0        | 1                |
| <b>Totals</b>   | <b>50</b> | <b>25</b> | <b>25</b> | <b>1</b>             | <b>0</b> | <b>0</b>            | <b>0</b> | <b>1</b>         |

Table 5  
Child Panel, Detail of Individual Failures

| Sample # | Gender | Age (mo) | Time of Entry<br>(total elapsed seconds) | Entry Description              |
|----------|--------|----------|--|--------------------------------|
| 44       | M      | 50       | 181                                      | Peeled at corner and tore open |

QuickPRO 1.5oz Pouch  
Final Report for Monsanto Company

---

Table 6  
Child Panel, Test Site Summary

| Test Site    | Number of Children Tested | % of Total Panel |
|--------------|---------------------------|------------------|
| 2            | 10                        | 20               |
| 17           | 10                        | 20               |
| 13           | 10                        | 20               |
| 58           | 3                         | 6                |
| 40           | 3                         | 6                |
| 72           | 3                         | 6                |
| 73           | 2                         | 4                |
| 21           | 1                         | 2                |
| 27           | 4                         | 8                |
| 29           | 4                         | 8                |
| <b>Total</b> | <b>50 Children</b>        | <b>100%</b>      |

Table 7  
Child Panel, Tester Summary

| Tester       | Number of Children Tested | % of Total Panel |
|--------------|---------------------------|------------------|
| CSN          | 15                        | 30               |
| EE           | 15                        | 30               |
| MN           | 5                         | 10               |
| CM           | 10                        | 20               |
| SS           | 5                         | 10               |
| <b>Total</b> | <b>50 Children</b>        | <b>100%</b>      |

#### 4 CONCLUSION

The testing data indicate the package meets the standard for child-resistant packaging as it is defined in the Code of Federal Regulations 16 CFR 1700. The adult use effectiveness was found to be 100%.

Submitted By Chris Novosad  
Chris Novosad

Date 2-23-06

*National Child Resistant Testing, Inc.*

## 5 DATA TABLES

### Senior Adult Test Data

| Sample # | Gender | Age | 5-min Open Time (sec) | 1-min Open Time (sec) | Result Pass/Fail | Comments |
|----------|--------|-----|-----------------------|-----------------------|------------------|----------|
| 1        | M      | 55  | 3                     | 2                     | P                |          |
| 2        | F      | 58  | 3                     | 2                     | P                |          |
| 3        | F      | 51  | 1                     | 1                     | P                |          |
| 4        | F      | 59  | 6                     | 1                     | P                |          |
| 5        | F      | 60  | 2                     | 2                     | P                |          |
| 6        | M      | 69  | 6                     | 2                     | P                |          |
| 7        | F      | 56  | 3                     | 3                     | P                |          |
| 8        | M      | 54  | 1                     | 1                     | P                |          |
| 9        | F      | 57  | 2                     | 1                     | P                |          |
| 10       | F      | 58  | 2                     | 2                     | P                |          |
| 11       | F      | 50  | 3                     | 1                     | P                |          |
| 12       | F      | 65  | 1                     | 2                     | P                |          |
| 13       | F      | 51  | 2                     | 1                     | P                |          |
| 14       | M      | 54  | 2                     | 2                     | P                |          |
| 15       | M      | 63  | 2                     | 2                     | P                |          |
| 16       | F      | 52  | 1                     | 2                     | P                |          |
| 17       | F      | 59  | 4                     | 1                     | P                |          |
| 18       | M      | 58  | 3                     | 3                     | P                |          |
| 19       | F      | 57  | 2                     | 3                     | P                |          |
| 20       | M      | 63  | 2                     | 2                     | P                |          |
| 21       | F      | 62  | 1                     | 2                     | P                |          |
| 22       | F      | 54  | 13                    | 1                     | P                |          |
| 23       | F      | 68  | 8                     | 3                     | P                |          |
| 24       | F      | 54  | 1                     | 1                     | P                |          |
| 25       | F      | 60  | 22                    | 2                     | P                |          |
| 26       | M      | 51  | 23                    | 9                     | P                |          |
| 27       | F      | 59  | 17                    | 3                     | P                |          |
| 28       | F      | 64  | 16                    | 4                     | P                |          |
| 29       | F      | 63  | 10                    | 4                     | P                |          |
| 30       | F      | 68  | 6                     | 13                    | P                |          |
| 31       | F      | 61  | 15                    | 6                     | P                |          |
| 32       | F      | 54  | 7                     | 5                     | P                |          |
| 33       | F      | 60  | 18                    | 4                     | P                |          |
| 34       | F      | 60  | 10                    | 4                     | P                |          |
| 35       | M      | 53  | 6                     | 13                    | P                |          |
| 36       | M      | 61  | 3                     | 2                     | P                |          |
| 37       | F      | 52  | 5                     | 4                     | P                |          |
| 38       | F      | 69  | 9                     | 7                     | P                |          |
| 39       | M      | 66  | 25                    | 3                     | P                |          |
| 40       | F      | 54  | 26                    | 3                     | P                |          |
| 41       | M      | 57  | 31                    | 9                     | P                |          |
| 42       | M      | 58  | 3                     | 3                     | P                |          |
| 43       | F      | 50  | 8                     | 2                     | P                |          |
| 44       | M      | 62  | 22                    | 2                     | P                |          |
| 45       | F      | 66  | 10                    | 32                    | P                |          |
| 46       | M      | 59  | 5                     | 5                     | P                |          |
| 47       | F      | 50  | 8                     | 2                     | P                |          |
| 48       | F      | 56  | 8                     | 6                     | P                |          |
| 49       | M      | 62  | 11                    | 5                     | P                |          |

National Child Resistant Testing, Inc

QuickPRO 1.5oz Pouch  
Final Report for Monsanto Company

| Sample # | Gender | Age | 5-min Open Time (sec) | 1-min Open Time (sec) | Result Pass/Fail | Comments |
|----------|--------|-----|-----------------------|-----------------------|------------------|----------|
| 50       | F      | 56  | 15                    | 3                     | P                |          |
| 51       | M      | 58  | 10                    | 3                     | P                |          |
| 52       | M      | 60  | 17                    | 5                     | P                |          |
| 53       | F      | 57  | 35                    | 11                    | P                |          |
| 54       | F      | 60  | 5                     | 9                     | P                |          |
| 55       | M      | 51  | 6                     | 2                     | P                |          |
| 56       | F      | 66  | 26                    | 4                     | P                |          |
| 57       | F      | 54  | 5                     | 6                     | P                |          |
| 58       | F      | 69  | 25                    | 6                     | P                |          |
| 59       | F      | 66  | 13                    | 3                     | P                |          |
| 60       | F      | 58  | 13                    | 4                     | P                |          |
| 61       | F      | 69  | 17                    | 6                     | P                |          |
| 62       | M      | 53  | 8                     | 2                     | P                |          |
| 63       | F      | 57  | 3                     | 3                     | P                |          |
| 64       | F      | 59  | 21                    | 9                     | P                |          |
| 65       | F      | 54  | 6                     | 4                     | P                |          |
| 66       | F      | 60  | 17                    | 4                     | P                |          |
| 67       | F      | 66  | 9                     | 4                     | P                |          |
| 68       | M      | 54  | 6                     | 4                     | P                |          |
| 69       | M      | 60  | 35                    | 12                    | P                |          |
| 70       | F      | 57  | 6                     | 4                     | P                |          |
| 71       | F      | 58  | 3                     | 6                     | P                |          |
| 72       | M      | 68  | 28                    | 8                     | P                |          |
| 73       | F      | 60  | 3                     | 6                     | P                |          |
| 74       | F      | 57  | 46                    | 6                     | P                |          |
| 75       | F      | 64  | 21                    | 44                    | P                |          |
| 76       | M      | 57  | 6                     | 3                     | P                |          |
| 77       | F      | 61  | 109                   | 9                     | P                |          |
| 78       | F      | 61  | 7                     | 2                     | P                |          |
| 79       | F      | 68  | 10                    | 10                    | P                |          |
| 80       | F      | 69  | 15                    | 4                     | P                |          |
| 81       | M      | 70  | 38                    | 13                    | P                |          |
| 82       | F      | 61  | 9                     | 4                     | P                |          |
| 83       | F      | 61  | 35                    | 13                    | P                |          |
| 84       | F      | 51  | 6                     | 6                     | P                |          |
| 85       | F      | 52  | 9                     | 3                     | P                |          |
| 86       | F      | 60  | 5                     | 5                     | P                |          |
| 87       | M      | 60  | 5                     | 1                     | P                |          |
| 88       | F      | 51  | 10                    | 5                     | P                |          |
| 89       | F      | 51  | 13                    | 10                    | P                |          |
| 90       | F      | 69  | 24                    | 3                     | P                |          |
| 91       | M      | 50  | 81                    | 5                     | P                |          |
| 92       | F      | 59  | 7                     | 3                     | P                |          |
| 93       | M      | 67  | 12                    | 23                    | P                |          |
| 94       | F      | 66  | 50                    | 38                    | P                |          |
| 95       | M      | 68  | 13                    | 12                    | P                |          |
| 96       | F      | 64  | 57                    | 10                    | P                |          |
| 97       | F      | 63  | 19                    | 4                     | P                |          |
| 98       | M      | 64  | 17                    | 3                     | P                |          |
| 99       | F      | 66  | 51                    | 21                    | P                |          |
| 100      | F      | 67  | 49                    | 7                     | P                |          |

Notional Child Resistant Testing, Inc

QuickPRO 1 5oz Pouch  
Final Report for Monsanto Company

**Child Test Data**

| Sample # | Gender | Age (mo) | Time of Entry (elapsed seconds) | Method of Entry                |
|----------|--------|----------|---------------------------------|--------------------------------|
| 1        | M      | 49       |                                 |                                |
| 2        | M      | 51       |                                 |                                |
| 3        | F      | 47       |                                 |                                |
| 4        | F      | 48       |                                 |                                |
| 5        | M      | 48       |                                 |                                |
| 6        | M      | 47       |                                 |                                |
| 7        | M      | 48       |                                 |                                |
| 8        | M      | 47       |                                 |                                |
| 9        | F      | 45       |                                 |                                |
| 10       | M      | 46       |                                 |                                |
| 11       | M      | 47       |                                 |                                |
| 12       | F      | 51       |                                 |                                |
| 13       | F      | 45       |                                 |                                |
| 14       | M      | 46       |                                 |                                |
| 15       | F      | 43       |                                 |                                |
| 16       | F      | 44       |                                 |                                |
| 17       | M      | 43       |                                 |                                |
| 18       | F      | 44       |                                 |                                |
| 19       | F      | 44       |                                 |                                |
| 20       | M      | 44       |                                 |                                |
| 21       | F      | 44       |                                 |                                |
| 22       | M      | 49       |                                 |                                |
| 23       | M      | 43       |                                 |                                |
| 24       | M      | 42       |                                 |                                |
| 25       | M      | 47       |                                 |                                |
| 26       | F      | 46       |                                 |                                |
| 27       | F      | 47       |                                 |                                |
| 28       | F      | 44       |                                 |                                |
| 29       | M      | 43       |                                 |                                |
| 30       | F      | 43       |                                 |                                |
| 31       | M      | 45       |                                 |                                |
| 32       | F      | 50       |                                 |                                |
| 33       | F      | 47       |                                 |                                |
| 34       | F      | 48       |                                 |                                |
| 35       | M      | 50       |                                 |                                |
| 36       | M      | 50       |                                 |                                |
| 37       | F      | 46       |                                 |                                |
| 38       | M      | 42       |                                 |                                |
| 39       | M      | 51       |                                 |                                |
| 40       | M      | 48       |                                 |                                |
| 41       | F      | 49       |                                 |                                |
| 42       | M      | 44       |                                 |                                |
| 43       | M      | 42       |                                 |                                |
| 44       | M      | 50       | 181                             | Peeled at corner and tore open |
| 45       | F      | 48       |                                 |                                |
| 46       | F      | 49       |                                 |                                |
| 47       | F      | 51       |                                 |                                |
| 48       | F      | 51       |                                 |                                |
| 49       | M      | 50       |                                 |                                |
| 50       | F      | 50       |                                 |                                |

National Child Resistant Testing, Inc.

**FEE-WHITE, DAWN M [AG/1000]**

---

**From:** Gross.Rosalind@epamail.epa.gov  
**Sent:** Wednesday, April 19, 2006 4:03 PM  
**To:** FEE-WHITE, DAWN M [AG/1000]  
**Cc:** Walters.Vickie@epamail.epa.gov  
**Subject:** Re. Monsanto QuikPRO CRP



Customer Test  
Agreement - Mons..

Dawn

It was good to talk with you this morning. As noted here are my comments regarding the child test. Please note there is one comment to the customer test agreement. It is The 50% male 50% female distribution of the child panel is for each age group. If you have any questions please feel free to call me. I will be in the office tomorrow.

Notes on EPA Reg. No. 524-535 CRP Testing

The children should be given 5 pouches at the beginning of the test. A placebo of rice is acceptable.

The definition of a child failure should be access to any amount of one pouch The definition of a pouch failure should be access to any amount of one pouch by any means such as puncture (even by one tooth), tear, open, etc. Note the placebo does not have to come out of the pouch the potential for placebo access such as through a tooth puncture is sufficient for a pouch failure. This approach is being adopted based on a worst case scenario calculation of a toxic or harmful amount of the product to an 11.4kg child, which is 118.2mg and a pouch contains 42,500 mg of the product.

The 50% male 50% female distribution of the child panel is for each age group. Please note this in the customer test agreement, which you sent me 4/18/06.

The final child report should include: a statement that the pouch was tested with placebo resembling the product; a statement that the number of pouches each child received at the beginning of the test was 5; a photograph of the pouch tested; a description of the material composition of the pouch.

The child study should be submitted in hard copy as well as electronic copy per PR 97-9. The test date and birth date fields should be numeric. The senior adult study should be resubmitted in hard copy with the electronic copy per PR 97-9. The test date and birth date fields should be numeric. The CD should be closed so that nothing else can be written to it. Copies of the CD should be retained in case something happens to the Agency copy and it needs to be resubmitted or certain fields need to be corrected.

Save all child test samples until the Agency accepts the data. Rosalind Gross Registration Division CM-2, Room 262 1801 South Bell St. Arlington, VA 22202 telephone 703-308-7368 fax 703-308-9382 email gross.rosalind@epa.gov

"FEE-WHITE,  
DAWN M  
[AG/1000]"  
<dawn.m.fee-whi  
te@monsanto.com  
>

To  
Rosalind Gross/DC/USEPA/US@EPA  
cc

Subject

04/18/2006  
04:02 PM

Monsanto QuikPRO CRP

Rosalind, thank you for the time last week on the phone. We had discussed possible review of the protocol and the number of pouches that may be necessary to fulfill the testing requirements. The National Child Resistant Testing that will performing our Child Resistant Test, has provided the attached outline of the re-test plan. Will this be sufficient? I've asked that they specify uncooked rice (rather than just rice) as the placebo. According to my manufacturing contact, this substance most closely resembles the QuikPRO product. As for the specific details of the testing protocol, they would follow the requirements of 1700.20. Please advise if the attached will fulfill our re-testing requirement or if we need to provide more than 5 pouches per child. Remember this is only sold in a box of five (5) 1.5 oz pouches. I seriously don't expect marketing to ever want to sell in higher units. Thanks for your direction.

Dawn Fee-White  
Monsanto  
314-694-6576

<<Customer Test Agreement - Monsanto 06-011.doc>>

This e-mail message may contain privileged and/or confidential information, and is intended to be received only by persons entitled to receive such information. If you have received this e-mail in error, please notify the sender immediately. Please delete it and all attachments from any servers, hard drives or any other media. Other use of this e-mail by you is strictly prohibited.

All e-mails and attachments sent and received are subject to monitoring, reading and archival by Monsanto. The recipient of this e-mail is solely responsible for checking for the presence of "Viruses" or other "Malware". Monsanto accepts no liability for any damage caused by any such code transmitted by or accompanying this e-mail or any attachment. (See attached file: Customer Test Agreement - Monsanto 06-011.doc)



MONSANTO



January 24 2006

Document Processing Desk (NOTIF)  
Registration Division – H7505C  
U S Environmental Protection Agency  
1801 South Bell Street  
Crystal Mall #2, Room 266A  
Arlington, Virginia 22202-4501

MONSANTO COMPANY  
1300 I (EYE) STREET, NW  
SUITE 450 EAST  
WASHINGTON D C 20005  
PHONE (202) 383-2806  
FAX (202) 789-1748  
<http://www.monsanto.com>

Attention Mr James A Tompkins  
Product Manager 25

Subject **MON 78365 Herbicide QuikPRO Herbicide; EPA Reg. No. 524-535**  
**Notification of Final Printed labeling and voluntary Certification of Child Resistant**  
**Packaging**

Dear Mr Tompkins

Monsanto herein notifies the Agency of a revised final printed label for QuikPRO Herbicide, print plate 90005E4-12/53 This label is based on the EPA Stamped label dated May 12, 2003 Revisions to this approved version were previously notified to the Agency November 9, 2004 This most recent printing simply resizes the booklet to fit the new child resistant packaging No precautionary or use instruction changes have been made

In addition, after a meeting between Monsanto and the Agency January 13, 2005, in a letter dated February 8, 2005, Monsanto agreed to research child resistant packaging options for package skus of QuikPRO herbicide Pursuant to requirements in 40 CFR Part 157.22, and 157.34, Monsanto is submitting certification to child-resistant packaging for the 6.8 lb package of QuikPRO herbicide, MON 78365 and distributor supplemental product, Lesco Prosecutor Swift Acting, 524-535-10404 Monsanto has selected a Van Blarcom Closure, Saf Cap III-A, ASTM certified type I closure compliant with CFR Title 16, Part 1700 and on the EPA list of approved CRP vendors

This notification is classified as part of the Agency's Fast-Track Program and therefore no fee is due The following documents are included with this notification

Application for Pesticide (form 8570-1)  
Three copies of final printed label

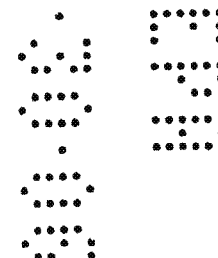
If you should have any questions regarding this submission, please call Dr Russell P Schneider at (202) 383-2866 or call me at (314) 694-6576

Sincerely,

Dawn Fee-White  
Registration Manager

Cc w/ attachments Russ Schneider  
Rosalind L Gross, Technical Review Branch

Attachment Component Specification



|  |  |  |  |
|--|--|--|--|
| <div style="display: inline-block; text-align: center; margin-left: 20px;">             United States<br/> <b>Environmental Protection Agency</b><br/>             Washington, DC 20460           </div>   |  | <input type="checkbox"/> Registration<br><input type="checkbox"/> Amendment<br><input checked="" type="checkbox"/> Other   | OPP Identifier Number<br><b>303827</b>   |
| <b>Application for Pesticide – Section I</b>   |  |  |  |
| 1 Company/Product Number<br><div style="text-align: center;">524-535</div>   |  | 2 EPA Product Manager<br><div style="text-align: center;">James A Tompkins</div>   |  |
| 4 Company/Product (Name)<br>MON 78365, QUIKPRO HERBICIDE / Monsanto Company  |  | PM #<br><div style="text-align: center;">25</div>  |  |
| 5 Name and Address of Applicant (Include ZIP Code)<br>Monsanto Company<br>1300 I Street, NW, Suite 450 East<br>Washington, DC 20005<br><input type="checkbox"/> Check if this is a new address   |  | 6 Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to EPA Reg No<br><br>Product Name  |  |
| <b>Section – II</b>  |  |  |  |
| <input type="checkbox"/> Amendment – Explain below<br><input type="checkbox"/> Resubmission in response to Agency letter dated<br><input checked="" type="checkbox"/> Notification – Explain below   |  | <input type="checkbox"/> Final printed labels in response to Agency letter dated<br><input type="checkbox"/> "Me Too" Application<br><input checked="" type="checkbox"/> Other – Explain below   |  |
| Explanation: Use additional page(s) if necessary (For section I and Section II)<br><b>Monsanto believes this is a fast-track notification with no associated PRIA fee. Please e-mail any fee requirement response to <a href="mailto:Regulatory.Affairs@Monsanto.com">Regulatory.Affairs@Monsanto.com</a>. Notification of final printed label.</b><br><br>I certify that the packaging that will be used for this product meets the standards of 40 CFR 157.32. |  |  |  |
| <b>Section – III</b>   |  |  |  |
| 1 Material This Product Will Be Packaged In  |  |  |  |
| Child-Resistant Packaging<br><input checked="" type="checkbox"/> Yes*<br><input type="checkbox"/> No<br><br><i>* Certification must be submitted</i>   | Unit Packaging<br><input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> No<br><br>If "Yes"<br>Unit Packaging wgt<br>6 8 lb | Water Soluble Packaging<br><input type="checkbox"/> Yes<br><input checked="" type="checkbox"/> No<br><br>If "Yes"<br>Package wgt<br>No per Container<br>2  | 2 Type of Container<br><input type="checkbox"/> Metal<br><input checked="" type="checkbox"/> Plastic<br><input type="checkbox"/> Glass<br><input type="checkbox"/> Paper<br><input type="checkbox"/> Other (Specify) |
| 3 Location of Net Contents Information<br><input type="checkbox"/> Label <input checked="" type="checkbox"/> Container   |  | 4 Size(s) Retail Container<br>6 8 lb   |  |
| 5 Location of Label Directions<br><input type="checkbox"/> On Label<br><input checked="" type="checkbox"/> On Labeling accompanying product  |  | 6 Manner in Which Label is Affixed to Product<br>In mold labeling with labeling under measuring cap<br><input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Other _____<br><input type="checkbox"/> Paper glued<br><input type="checkbox"/> Stenciled |  |
| <b>Section – IV</b>  |  |  |  |
| 1 Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application )   |  |  |  |
| Name<br><div style="text-align: center;">Russell P Schneider Ph D</div>  |  | Title<br><div style="text-align: center;">Director, Regulatory Affairs</div>   |  |
| Telephone No (Include Area Code)<br><div style="text-align: center;">(202) 383-2866</div>  |  | 6 Date Application Received (Stamped)  |  |
| <b>Certification</b><br>I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law   |  |  |  |
| 2 Signature<br>  |  | 3 Title<br><div style="text-align: center;">Registration Manager</div>   |  |
| 4 Typed Name<br><div style="text-align: center;">Dawn M Fee-White</div>  |  | 5 Date<br><div style="text-align: center;">26 January 2006</div>   |  |

MONSANTO



1300 I (EYE) STREET, NW  
SUITE 450 EAST  
WASHINGTON, D C 20005  
PHONE (202) 383-2866  
FAX (202) 789-1748  
<http://www.monsanto.com>

February 8, 2005

Document Processing Center  
Office of Pesticide Programs (7504C)  
U.S. Environmental Protection Agency  
Room 266A, Crystal Mall #2  
1921 Jefferson Davis Highway  
Arlington, VA 22202-4501

Attention: Mr. James A. Tompkins  
Team Leader (25)

**Subject: MON 78365 Herbicide  
QuikPRO Herbicide  
EPA Reg. No. 524-535  
Determination on Applicability of Child Resistant Packaging  
Requirements**

Dear Mr. Tompkins:

On January 13, 2005, Dr. Russell Schneider, Mr. Tom Carratto, Monsanto Associate General Counsel, and I, met with Dr. Rosalind Gross and Ms. Vickie Walters to review Monsanto's request for an exemption from child-resistant packaging requirements (Letter dated November 8, 2004) pursuant to 40 CFR Part 157.24(b), for formulations currently approved under EPA registration number 524-535.

We would like to thank Dr. Gross and Ms. Walters for their time and we greatly appreciate their efforts in explaining the process for such exemption requests and Dr. Gross' suggested alternatives for how Monsanto might proceed on this matter.

During our meeting, it was suggested that Monsanto seek a determination from the Registration Division as to whether or not the CRP requirements for acute inhalation toxicity are applicable to MON 78365 herbicide (alternate brand name: QuikPRO herbicide), considering that 1) the acute inhalation toxicity study could not be conducted on the dry product as commercially packaged and 2) there is essentially no concern for inhalation exposure as only a negligible percentage (0.002%) of particles from this dry product are in the respirable range of less than 10 microns.



AA052960


ED\_006453A\_00002856-00019

As stated in our exemption request letter dated November 8, 2004, due to its physical characteristics there is no practical means by which to determine the acute inhalation LC50 value of the undiluted granular product. In addition, given that there are essentially no particles in the respirable range, young children who may come in contact with the packaged product would experience negligible exposure via inhalation. For these reasons, there is no risk of serious injury or illness from accidental exposure to this product that would be reduced by the use of child-resistant packaging. Thus, Monsanto believes that the formulation currently approved under this registration should not be subject to child-resistant packaging requirements on the basis of the acute inhalation LC<sub>50</sub> as determined in the submitted study (MRID 45434304). According to Dr. Gross, an evaluation of this information and a subsequent determination would appropriately be made by the technical reviewer in the Technical Review Branch who originally reviewed the acute toxicity studies supporting this registration approval.

Because of the ambiguity that exists with regard to the applicability of the CRP standards to this product, Monsanto is in the process of researching packaging options for this product. While the above request is being considered by the Agency, Monsanto intends to begin immediately with our next scheduled production utilizing child-resistant packaging for both package SKUs of QuikPRO herbicide.

If you have any questions regarding this request feel free to contact me through Dr. Russell P. Schneider at 202-383-2866 or directly at 314-694-8890.

Sincerely,



Annette M. Kirk  
Registration Manager

cc R P. Schneider  
J B Winski